

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GLOBAL NETWORK COMMUNICATIONS, INC.,	:	
	:	07 Civ. 11209 (LBS)
Plaintiff,	:	
	:	
- against -	:	<u>NOTICE OF MOTION</u>
	:	
CITY OF NEW YORK and CITY OF NEW YORK	:	
DEPARTMENT OF INFORMATION TECH-	:	
NOLOGY AND TELECOMMUNICATIONS,	:	
	:	
Defendants.	:	
-----X	:	

PLEASE TAKE NOTICE THAT upon the declaration of Ronald E. Massie dated December 13, 2007 and the declaration of Joseph P. Garland dated December 13, 2007, all of the prior proceedings herein, and such evidence as presented at a hearing on this matter, Plaintiff Global Network Communications, Inc. shall move this Court in Courtroom 15A, United States Courthouse, 500 Pearl Street, in the City, County, and State of New York, before the Hon. Leonard B. Sand on January 15, 2008 at 3:00pm for an order:

(i) pursuant to Rule 65 of the Federal Rules of Civil Procedure enjoining Defendants and each of them, as well as any person acting on behalf of either of them during the pendency of this action from taking any action to remove, or force the sale or removal of, any of Plaintiff's public pay telephones on the public rights-of-way within the City of New York pending the conclusion of this Action; and

(ii) granting Plaintiff such other and further relief as is just and appropriate.

Dated: New York, New York
January 7, 2008

LAW OFFICE OF JOSEPH P. GARLAND

By: _____ /S/
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Attorneys for Plaintiff

To: MICHAEL A. CARDOZO
Corporation Counsel of The City of New York
Of Counsel: Diana Murray, Esq.
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Attorneys for Defendants